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Reply to NY

November 29, 2012

**BY FAX ONLY: 212.805.7991**  
The Honorable J. Paul Oetken  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**APPLICATION GRANTED:**

  
HON. J. PAUL OETKEN  
UNITED STATES DISTRICT JUDGE

11/30/12

**RE: *United States v. Michelle Glick***  
**S1 12 CR 171 (JPO)**

Dear Judge Oetken:

I write to request an amendment to Michelle Glick-Stite's conditions of bail to permit her to travel to Superior, Wisconsin. On March 6, 2012, Ms. Glick-Stites was released on a bond of \$100,000 secured by two suretors, her mother Ilene Glick and her husband David Stites. Her travel was restricted to the Southern and Eastern Districts of New York and Minnesota. Her only reporting requirement is to advise Pretrial Services of her travel. She is compliant with her conditions of bond. See Senior U.S. Probation Officer Matthew T. Whiting's letter dated September 26, 2012 attached.

Ms. Glick-Stites resides in Duluth, Minnesota which is within minutes (actually a foot bridge) away from Superior, Wisconsin. Ms. Glick-Stites does not have a driver's license and therefore her travel is limited to places she can reach by public transportation. There is regular public transportation between Duluth and Superior.

DONNA R. NEWMAN  
ATTORNEY AT LAW

MEMBER  
NY AND NJ BAR

Ms. Glick-Stites is a newlywed and both her and her husband are new to Duluth. Many of the people she and her husband have met reside in Wisconsin. Superior offers many more restaurants and it is in Superior that community activities like parades, and festivals take place. There are likewise many more shopping options, including farmer's markets with wholesale produce. Her inability to travel to Wisconsin has circumscribed their social life considerably and added stress to her new marriage which is stressful enough in light of the pending criminal charges. Travel into nearby Superior would allow her to visit with friends and socialize with colleagues from work

The Government does not object to this request. Her Probation Officer, Matthew T. Whiting advised counsel he objects to this amendment, but when asked for a reason for his opposition to the request he provided none. I emphasize Ms. Glick has been totally compliant with the terms of her bond. There is no reason to restrict her travel to Minnesota.

Wherefore, it is respectfully requested that Ms. Glick's bail be modified to include travel into Wisconsin.

Respectfully submitted,



Donna R. Newman  
DRN/ad

cc: AUSA Nicholas McQuaid, Esq-via email  
Sen. U.S. Probation Officer Matthew T. Whiting-via fax  
Michele Glick

Sep-26-2012 10:51 AM U.S. PROBATION 2185293546



KEVIN D. LOWRY  
Chief Probation Officer  
300 S 4th St., Ste. 406  
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UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
PROBATION AND PRETRIAL SERVICES OFFICE

316 N Robert St., Ste. 600  
St. Paul MN 55101-1465  
651-848-1250  
FAX 651-848-1253

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619 Beltrami Ave. NW, Ste 100  
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118 S Mill St., Ste. 304  
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218-739-0041 or  
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Reply to: Duluth

September 26, 2012

Donna R. Newman  
Attorney at Law  
20 Vesey Street, Suite 400  
New York, NY 10007

Dear Ms. Newman:

I have received your faxed letter requesting confirmation that Ms. Glick has been compliant with all of her bond conditions. Ms. Glick is in compliance with her bond conditions. She remains in communication with me regarding any travel or concerns she may have.

Sincerely,

Matthew T. Whiting  
Senior U.S. Probation Officer  
218-529-3550

MTW:jm